

April 24, 2024

**SUBMITTED VIA ECF AND EMAIL**

The Honorable Katherine Polk Failla  
 United States District Judge  
 United States District Court for the Southern District of New York  
 40 Foley Square  
 New York, NY 10007  
[Failla\\_NYSDChambers@nysd.uscourts.gov](mailto:Failla_NYSDChambers@nysd.uscourts.gov)

Re: *A&E Television Networks, LLC v. Big Fish Entertainment, LLC et al.*, 22-cv-07411  
 (S.D.N.Y.)

Dear Judge Failla:

Pursuant to the April 17, 2024 pre-trial conference in this action, the parties have met-and-conferred about the expert discovery schedule. The below table identifies (i) the schedule the parties originally proposed in their April 11 joint pre-trial conference statement, and (ii) a proposed revised schedule, in view of the Court's comments at the April 17 conference that the parties should carefully consider the amount of time they need to ensure expert discovery will be complete without further extensions:

	<b>April 11 Proposed Schedule</b>	<b><u>Revised Proposed Schedule</u></b>
Initial Expert Reports	May 3	<b>May 17</b>
Responding Reports	June 5	<b>June 20</b>
Rebuttal Reports	June 25	<b>July 11</b>
Close of Expert Discovery	August 1	<b>August 9</b>

The parties respectfully request that the Court so order the revised proposed expert discovery schedule above, i.e., Initial Reports due May 17; Responding Reports due June 20; Rebuttal Reports due July 11; and the close of expert discovery to occur by August 9.

We thank the Court for its consideration of this request.

Dated: April 24, 2024  
New York, New York

Respectfully submitted,

/s/ David Yohai

David L. Yohai  
Benjamin E. Marks  
H. David Leslie  
Fredrick Rhine  
WEIL GOTSHAL & MANGES LLP  
767 Fifth Ave.  
New York, NY 10153  
Phone: (212) 310-8000  
Fax: (212) 310-8007  
david.yohai@weil.com  
benjamin.marks@weil.com  
harold.leslie@weil.com  
fredrick.rhine@weil.com

David Yolkut  
MAYER BROWN LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Phone: (212) 506-2500  
Fax: (212) 262-1910  
dyolkut@mayerbrown.com

*Attorneys for Plaintiff*

/s/ Orin Snyder

Orin Snyder  
Alexandra Perloff-Giles  
Doran J. Satanove  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166  
Phone: (212) 351-2400  
Fax: (212) 351-6335  
osnyder@gibsondunn.com  
aperloff-giles@gibsondunn.com

Jay P. Srinivasan  
Ilissa Samplin  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Phone: (213) 229-7296  
Fax: (213) 229-6296  
jsrinivasan@gibsondunn.com  
isamplin@gibsondunn.com

*Attorneys for Defendants*